

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

\$53,082,824.19 IN U.S. CURRENCY,

*Defendant.*

No: 19-cv-01930

**BANCO SAN JUAN INTERNACIONAL, INC.'S**  
**MOTION TO (PROVISIONALLY) RESTRICT ITS**  
**MOTION TO LIFT RESTRICTIONS UNTIL THE COURT DETERMINES**  
**THE UNDERLYING MOTION TO LIFT RESTRICTIONS**

TO THE HONORABLE COURT:

COMES NOW, Banco San Juan Internacional, Inc. ("BSJI"), by and through its undersigned attorneys, and files this motion to provisionally restrict *Banco San Juan Internacional's Motion to Lift Restrictions, and Motion to (Provisionally) Restrict This Motion Until the Court Determines the Underlying Motion to Lift Restrictions* (the "Filing"), Dkt. 71, for the reasons more specifically set forth below:

In compliance with the requirements of this Court's Standing Order No. 9, dated January 30, 2013, BSJI respectfully requests that the Filing be provisionally accepted by the Court for filing with the following level of restriction: *SELECTED PARTIES: Limiting viewing to the attorneys for Claimant, attorneys for the Respondent, and the Court.*

BSJI is filing the Filing with the requested level of restriction out of an abundance of caution in light of the Court's October 18, 2019 and December 2, 2019 Orders granting BSJI's and the Government's motions to restrict, respectively. (Dkts. 44-46, 63-68.) As noted in the

accompanying papers, the original reason for BSJI's earlier motions to restrict has become moot, because a previously sealed order relied upon and quoted by BSJI in those submissions has now been unsealed. The government, however, continues to seek restrictions that BSJI finds unnecessary.

WHEREFORE, BSJI respectfully prays the Court provisionally accept and file the Filing under the requested restriction level, and that an ORDER issue directing the Filing to remain under such restriction level until further order by the Court.

Dated: December 4, 2019

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*Counsel for Banco San Juan Internacional, Inc.*

**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed on December 4, 2019 with the Clerk of Court using the CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

/s/ Abbe David Lowell  
Abbe David Lowell